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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

MARTIN LYNCH, ET AL., v. MULTNOMAH COUNTY, ET AL., Defendants.	Plaintiffs, Case No. 3:23-cv-01502-IM (lead case) UNOPPOSED MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT
JEFFREY SAWYER, ET AL., v. MARION COUNTY, ET AL., Defendants.	Plaintiffs, Case No. 3:23-cv-01971-IM
MATTHEW GABBERT, ET AL., v. JOSEPHINE COUNTY, ET AL., Defendants.	Plaintiffs, Case No. 1:23-cv-01434-IM

JERRY BAKER,

Plaintiff,

Case No. 2:24-cv-01503-IM

v.

BAKER COUNTY,

Defendant.

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Pursuant to Federal Rule of Civil Procedure 15, the *Gabbert* Plaintiffs respectfully request leave to file the Third Amended Complaint, attached hereto as Exhibit 1. A blacklined version comparing the operative Second Amended Complaint with the proposed Third Amended Complaint is attached as Exhibit 2. Although Defendants have provided written consent to the amendment pursuant to Rule 15(a)(2), Plaintiffs submit this motion out of an abundance of caution and to formally notify this Court and all parties of this development.¹

Rule 15(a)(2) instructs that leave to amend should be “freely given when justice so requires.” Plaintiffs seek this amendment well within the deadline set by the Court—currently September 28, 2025—and have joined a pending motion to extend that deadline. (ECF No. 89.) The proposed amendment is narrow in scope: it substitutes plaintiffs to address adequacy concerns raised by Defendants. No other substantive changes are made.

Because Defendants have consented to the amendment, and because the proposed changes are intended to resolve a potential adequacy issue and streamline the litigation, leave to amend should be granted.

Date: September 9, 2025

Respectfully Submitted,

/s/ A. Dami Animashaun

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One of the attorneys for the Gabbert and Baker Plaintiffs

¹ By consenting to this amendment, Defendants do not waive the right to challenge the allegations of the Third Amended Complaint.